

EXHIBIT 2

Sosa, Javier F.

From: Stolze, Eric D. <ericstolze@paulhastings.com>
Sent: Friday, May 5, 2023 7:28 PM
To: Alonzo, Julia D.; Sosa, Javier F.; Bassett, Nicholas; Farmer, Will C.; Despins, Luc A.; Jimenez, Pedro; Whitner, William K.; Bongartz, Alex
Cc: Swanson, Nicole O.; Dale, Margaret A.; Stafford, Laura; apavel@omm.com; mbenitesgutierrez@omm.com; Barak, Ehud; Possinger, Paul V.; emckeen@omm.com; Peter Friedman; Maria J. DiConza
Subject: RE: PREPA - Committee's First Set of Document Requests
Attachments: PREPA -- Informative Motion(170230230_4).DOCX

This email sent by ericstolze@paulhastings.com originated from outside the Firm.

Julia,

In an additional effort to file a Joint Informative Motion, please modify the attached document and return it to us by the close of business on Monday so that we may file it by that evening.

To the extent you contend any Discovery Dispute has not crystallized over our prior conference and these emails, I can be available at any point through Monday to discuss further (with the exception of Saturday from 11:00 a.m. to 2:00 p.m. and Monday from 4:30 p.m. to 5:00 p.m.). Thank you.

PAUL
HASTINGS

Eric D. Stolze | Of Counsel, Litigation Department

Paul Hastings LLP | 1170 Peachtree Street, N.E., Suite 100, Atlanta, GA 30309 | Direct: +1.404.815.2315 | Main: +1.404.815.2400 | Fax: +1.404.685.5315 | ericstolze@paulhastings.com | www.paulhastings.com

From: Alonzo, Julia D. <jalonzo@proskauer.com>
Sent: Tuesday, May 2, 2023 4:15 PM
To: Stolze, Eric D. <ericstolze@paulhastings.com>; Sosa, Javier F. <Jsosa@proskauer.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; Farmer, Will C. <willfarmer@paulhastings.com>; Despins, Luc A. <lucdespins@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Whitner, William K. <kwhitner@paulhastings.com>; Bongartz, Alex <alexbongartz@paulhastings.com>
Cc: Swanson, Nicole O. <NSwanson@proskauer.com>; Dale, Margaret A. <mdale@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>; apavel@omm.com; mbenitesgutierrez@omm.com; Barak, Ehud <ebarak@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; emckeen@omm.com; Peter Friedman <pfriedman@omm.com>; Maria J. DiConza <mdiconza@omm.com>
Subject: [EXT] RE: PREPA - Committee's First Set of Document Requests

--- External Email ---

Counsel:

We disagree with your characterization of the parties' communications to date. In particular, I note that you did not respond to my email of April 27 until May 1, four days later. Any exigency is due to your own delay.

If you believe a Discovery Dispute has crystallized pursuant to the terms of the Confirmation Procedures Order, we cannot prevent you from seeking relief from the Court. We will make our positions clear to the court in our joint informative motion. That said, we respond to each of the topics of your email in turn.

First, attached hereto are the hit reports that we provided counsel to the Ad Hoc Group of PREPA Bondholders for their Request Nos. 2 and 6. We are in the process of uploading documents responsive to these Requests, based on the narrowed searches reflected in the hit reports, to the Plan Depository. We confirm that, for the reasons previously explained, we are not willing to search for or produce any additional communications to the Requests listed in your email. However, of the Requests listed in your email, we have provided documents responsive to your Request Nos. 9, 11, and 21. We also served our privilege log last week, which provides information regarding our privilege assertions with respect to, among others, your Request Nos. 2, 3, 5, 6, 7, 15, 16, 17, 18, 19, 27, 28, and 51. Further, our forthcoming production of communications is responsive to your Request No. 62, which specifically seeks any documents uploaded in response to, among others, the Ad Hoc Group's Request No. 2.

More fundamentally, you have not narrowed the scope any of the Requests for which you seek communications, either in terms of custodian, time frame, or search terms. Given the overwhelming breadth of your Requests and your ongoing refusal to engage in such narrowing, we have no basis upon which to work with you to identify communications relating to critical issues.

Second, as noted above, we sent our initial privilege log on April 28. We intend to update this log on May 12. As such, you now have our articulation of privilege with respect to communications. If you have questions regarding the assertions of privilege in that log, we are willing to discuss them with you.

Third, we take issue with the accusation in your email that we are needlessly drawing out our investigations to avoid producing responsive documents. On the contrary, we have been engaging with you, and with all other parties, in good faith, including by continuing to investigate your Requests for which we indicated we would do so. Our letter of April 24 provided substantive updates to twelve of the Requests, and we intend to send you via separate correspondence further updates regarding these investigations. We also have since uploaded documents to the Plan Depository that are responsive to another eight of your Requests.

We intend to object to any efforts imposed by you to holding any depositions open beyond the 7 hours allocated by the Confirmation Procedures Order on the day that such depositions have been noticed. We reserve all rights in this respect.

Lastly, we did not agree to provide you with specific bates numbers of uploaded documents during our meet and confer, and we do not agree to do so now. We request that you review all documents that are newly uploaded to the Plan Depository, and if you have questions about what documents are responsive to any of your Requests, please ask us and we will review.

Thank you,

Julia

Julia D. Alonzo
Senior Counsel
(she/her/hers)

[Proskauer](#)
Eleven Times Square
New York, NY 10036-8299

d 212.969.4558

f 212.969.2900

jalonzo@proskauer.com

greenspaces

Please consider the environment before printing this email.

From: Stolze, Eric D. <ericstolze@paulhastings.com>

Sent: Monday, May 1, 2023 1:31 PM

To: Alonzo, Julia D. <jalonzo@proskauer.com>; Sosa, Javier F. <Jsosa@proskauer.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; Farmer, Will C. <willfarmer@paulhastings.com>; Despins, Luc A. <lucdespins@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Whitner, William K. <kwhitner@paulhastings.com>; Bongartz, Alex <alexbongartz@paulhastings.com>

Cc: Swanson, Nicole O. <NSwanson@proskauer.com>; Dale, Margaret A. <mdale@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>; apavel@omm.com; mбенitesgutierrez@omm.com; Barak, Ehud <ebarak@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; emckeen@omm.com; Peter Friedman <pfriedman@omm.com>; Maria J. DiConza <mdiconza@omm.com>

Subject: RE: PREPA - Committee's First Set of Document Requests

This email originated from outside the Firm.

Julia,

Your ongoing refusal to join the requested motion has delayed our efforts to obtain resolution of this discovery dispute. The history of our communications, beginning with the April 19 meet and confer and continuing over email, evidences a transparent effort: (i) to avoid judicial review of the unreasonable positions taken within the Objections & Responses (and during our Dispute Conference); and (ii) to delay “Court intervention” by contending nothing has “yet crystalized.”

- Complete Reversal Regarding Communications – To provide an accurate summary of the positions taken by the Board during our call, we were unequivocally told “no” in response to our direct question of whether the Board is willing to produce *any communications*. In addition, we were also flatly told that the Board would not be undertaking any search whatsoever for any Request where the Responses & Objections stated the Board “declines to search for documents”—as is the case for 19 of our Requests.

We raised, and discussed, the “targeted” language Judge Dein used in the transcript you cite, but you were unmoved by it and maintained an absolute position that no searches for communications would be undertaken. Indeed, “General Objection” No. 3 within the Objections and Responses stated the Board “objects ... to each and every Request, as unduly burdensome to the extent they seek “Communications” because any search would not be proportional to the needs of the case.” It is disingenuous for you to now claim a discovery dispute is not ripe “because [we] did not identify any specific requests that address communications for which you believe a more targeted, narrow search would result in responsive and not overwhelmingly privileged documents,” particularly where that discussion was truncated—and would have been futile—given your total refusal to search for communications.

Nonetheless, please forward the following information about the “targeted search of communications” you are undertaking for the Ad Hoc Group: (i) list of custodians; (ii) data sources for each of those custodians; (iii) date range/time frame for each data source; and (iv) the search parameters being used.

Because we have no context for what you subjectively deem to be “overwhelmingly privileged” or “more targeted, narrow search,” and so that we may have a clear and written record of your position, please advise in writing whether the Board (despite its initial position that it would not perform any searches for

communications) will now search for communications (and, if so, the scope of that search, *i.e.*, custodians, date ranges, data sources, and number of search terms) for each of the following Requests: 2, 3, 5, 6, 7, 8, 9, 11, 15, 16, 17, 18, 19, 21, 24, 25, 27, 28, 49, 50, 51. Although your Objections and Responses to Request 52 do not assert an objection to communications, please provide the information requested within this paragraph as to that Request as well.

We need to have finality on your position, via a written response, no later than close of business tomorrow.

- Privilege – We have no misunderstanding regarding privilege. Your response below confirms the assertion of privilege over documents that have not been reviewed.

In addition, your response qualifies each assertion of privilege and concedes an expectation that non-privileged documents do exist. For example, you contend responsive documents would be “*almost* entirely ... covered by ... privilege” and/or “*overwhelmingly* privileged.” Without any statistics about the number of documents that would be reviewed, or any factual basis on which to assert what proportion of responsive documents would/would not be privileged, no foundation exists for your assumption that undertaking searches would be burdensome.

- Endless and Open-Ended Ongoing Investigation – The Board’s position appears to be that a discovery dispute will never ripen so long as you assert you are continuing to “investigate.” Given that depositions commence this week, and continue in the weeks that follow, we must have a date certain by which your investigation will conclude and your production will be complete (excluding supplementation for documents generated in the future).

In the interim, we will reserve all rights in regards to the upcoming depositions, including to keep them open as a result of the Board not having completed its document production obligations.

Finally, please honor the commitment made during our Discovery Conference for the Board to identify by Bates Number when additional documents are added to the data room that are responsive to any of our Request(s). Thank you.

**PAUL
HASTINGS**

Eric D. Stolze | Of Counsel, Litigation Department

Paul Hastings LLP | 1170 Peachtree Street, N.E., Suite 100, Atlanta, GA 30309 | Direct: +1.404.815.2315 | Main: +1.404.815.2400 | Fax: +1.404.685.5315 | ericstolze@paulhastings.com | www.paulhastings.com

From: Alonzo, Julia D. <jalonzo@proskauer.com>

Sent: Thursday, April 27, 2023 7:06 PM

To: Stolze, Eric D. <ericstolze@paulhastings.com>; Sosa, Javier F. <Jsosa@proskauer.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; Farmer, Will C. <willfarmer@paulhastings.com>; Despina, Luc A. <lucdespins@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Whitner, William K. <kwhitner@paulhastings.com>; Bongartz, Alex <alexbongartz@paulhastings.com>

Cc: Swanson, Nicole O. <NSwanson@proskauer.com>; Dale, Margaret A. <mdale@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>; apavel@omm.com; mhenitesgutierrez@omm.com; Barak, Ehud <ebarak@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; emckeen@omm.com; Peter Friedman <pfriedman@omm.com>; Maria J. DiConza <mdiconza@omm.com>

Subject: [EXT] RE: PREPA - Committee's First Set of Document Requests

--- External Email ---

You don't often get email from jalonzo@proskauer.com. [Learn why this is important](#)

Eric,

Thank you for your clarification. We disagree with your positions and continue to believe that we have not reached an impasse warranting Court intervention.

As a preliminary note, we disagree with your interpretation of what is required to inform the Court of a discovery dispute, nor do we agree that either the April 19 meet-and-confer or our April 24 letter constituted a "Dispute Conference" under the terms of the Confirmation Procedures Order.

In any event, we address the substance of the three issues raised in your email below.

First, as to communications, Judge Dein stated that the Ad Hoc Group "ha[d]n't convinced [her] that this is an area that's rich for discovery," but that she was "not going to prevent [the parties] from continuing a discussion about producing communications" using narrowed search parameters. Hr'g Tr. at 35:7-10. We did, in fact, continue discussing search parameters for AHG Request Nos. 2 and 6, and we are currently reviewing the results from a targeted search of communications following negotiations as to scope, time frame, custodians, and search terms. We will upload responsive, non-privileged communications to the depository, and we believe they may be responsive to certain of your requests (including your Request Nos. 6, 31, 32, 38, and 62). Because you did not identify any specific requests that address communications for which you believe a more targeted, narrow search would result in responsive and not overwhelmingly privileged documents, we are not willing to undertake any additional searches at this time.

Second, you misunderstand our privilege positions. We are not refusing to produce documents in response to your requests because we presume the documents are privileged. Instead, we are refusing to produce documents at this time because we believe any responsive documents would be so overwhelmingly privileged that it would be burdensome to review and log those documents. For example, Request Nos. 1, 2, and 4 seek drafts of the Fuel Line Lender PSA, documents communications regarding entering into the Fuel Line Lender PSA, and documents considered by the Oversight Board in determining whether to enter into the Fuel Line Lender PSA. Documents responsive to these Requests as drafted would almost entirely be covered by mediation privilege. The same is true for Request Nos. 14 and 15, which seek similar materials for the National settlement. Numerous other Requests seek documents that would overwhelmingly be protected by attorney-client privilege, including 19 and 22 (the Oversight Board's analysis of National's claims), 49 through 51 (analysis and assessment of the Fuel Oil Litigation or other litigation claims), and 60 (the Board's assessment of any discrimination against GUC holders). Again, given your refusal thus far to narrow any of your searches in response to our privilege concerns, this burden remains. In any event, as we informed you on our meet and confer, we intend to produce an initial privilege log tomorrow, April 28. And as far as additional facts triggering privilege, the dates on which common interest privilege attached for the Vitol, Fuel Line Lenders, and National settlements are July 14, November 19, and December 16, respectively.

Third, you are correct that discovery in this matter is ongoing. Indeed, fact discovery does not close until May 26. In connection with our April 24 letter, we uploaded documents relating to Request Nos. 11, 20, 21, 32 and 41. We also provided you with additional substantive information, including referring you to specific documents in the Plan Depository, for Request Nos. 32, 33(c) through (e), 34, 36, 48, 56. We subsequently informed you in our April 26 letter that we would be uploading documents responsive to Request Nos. 9, 10, 23, 26, and 47. We are continuing to investigate the remaining requests for which we indicated we would do so, including in large part by discussing whether LUMA has any responsive documents in their possession. And we intend to produce responsive documents that we discover, either from LUMA or elsewhere, in connection with the timeframe set by the Court. We fail to understand how our ongoing efforts to identify documents in response to your requests poses a dispute that is ripe for review by the Court.

We remain willing to confer with you regarding these issues. Should you insist upon seeking Court intervention, we intend to make clear to the Court our view that the parties have not reached impasse on any requests, as we did in our prior disputes with the Ad Hoc Group. See ECF No. 3347.

Regards,

Julia

Julia D. Alonzo

Senior Counsel
(she/her/hers)

[Proskauer](#)

Eleven Times Square
New York, NY 10036-8299
d 212.969.4558
f 212.969.2900
jalonzo@proskauer.com

greenspaces

Please consider the environment before printing this email.

From: Stolze, Eric D. <ericstolze@paulhastings.com>

Sent: Wednesday, April 26, 2023 9:26 PM

To: Alonzo, Julia D. <jalonzo@proskauer.com>; Sosa, Javier F. <Jsosa@proskauer.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; Farmer, Will C. <willfarmer@paulhastings.com>; Despina, Luc A. <lucdespins@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Whitner, William K. <kwhitner@paulhastings.com>; Bongartz, Alex <alexbongartz@paulhastings.com>

Cc: Swanson, Nicole O. <NSwanson@proskauer.com>; Dale, Margaret A. <mdale@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>; apavel@omm.com; mberitesgutierrez@omm.com; Barak, Ehud <ebarak@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; emckeen@omm.com; Peter Friedman <pfriedman@omm.com>; Maria J. DiConza <mdiconza@omm.com>

Subject: RE: PREPA - Committee's First Set of Document Requests

This email originated from outside the Firm.

Julia,

We held a meet and confer with you on the afternoon of Wednesday, April 19. During that conversation, we outlined both our global issues with the Objections & Responses and discussed certain requests by number (following up with an email, as requested). We reached an impasse on some of our disputes on that very call. For other areas of disagreement, we cooperated by awaiting the update you provided on the evening of Monday, April 24. Based on that update (both its contents as well as the information omitted from it, which we requested and expected to see within it), we see no reason to delay presentation of this Discovery Dispute to the Court.

The draft informative motion we prepared for the purpose of raising the dispute with the Court complies with the relevant portion of the Confirmation Discovery Procedures Order. Specifically, paragraph 22 of the order, which you reference, states only that the parties shall *inform* the Court of the *existence* of a discovery dispute via the filing of a joint informative motion. The order does not require identification of topics within the joint motion but instead instructs the parties to describe the subjects in dispute in subsequent letters to the Court.

Although the issues in dispute were specified within our prior meet and confer, they are summarized below for your reference.

- Blanket Refusal to Produce Communications – The Responses & Objections flatly stated “any ... search” for Communications “will not be proportional.” During our meet and confer, we received confirmation this was your final position and that neither search of nor production of Communications will occur. This was despite our differing interpretation that Judge Dein did not impose a complete bar to discovery of Communications, but rather stated the need for targeted requests. We were willing to negotiate the scope of acceptable, targeted requests (to the extent you deemed our Requests to be broader)—but you took an absolute position that no Communications are proportional for any of our Requests.
- Privilege – We expressed our inability to understand either *what* privilege(s) were being asserted, or the bases on which such privilege(s) were asserted, for any specific request. We asked that the update provided on Monday, April 24 contain additional information to assist us with evaluating your privilege assertions, including the facts that underlie them. That subject was not addressed in that update in any way. (To date, we have received only a citation to the Mediation Order). Further, as we confirmed during our meet and confer, you have asserted privilege(s) over documents without undertaking any review of them. Rather, you have “decline[d] to search for documents” based on your assessment of the probability that privilege(s) would be asserted, if a review was undertaken. That is improper and inconsistent with the Court’s prior discovery rulings.
- Generalities of the Update – Discovery in the matter is ongoing. Two depositions are scheduled for next week, with additional depositions in the weeks that follow. For several requests, the “update” provides no more information than what was provided in the Responses & Objections, *i.e.*, the Responses and Objections (dated April 7) stated you were “willing to investigate,” and the April 24 (update) states you are “continuing to investigate” with an open-ended statement of “provid[ing] an update as soon as we can.” Although you request the “precise issues for which we seek judicial review,” that cannot be done exhaustively given the global issues outlined above and the limited information we have regarding your investigation, whether and what types of documents will be borne by that investigation, and on what timeline your production will be complete.

We are, of course, willing to continue to speak with you to narrow, if not resolve, these areas of disagreement, assuming you are willing to modify your positions; however, we need to raise a discovery dispute with the Court as soon as possible given the commencement of depositions next week.

PAUL
HASTINGS

Eric D. Stolze | Of Counsel, Litigation Department

Paul Hastings LLP | 1170 Peachtree Street, N.E., Suite 100, Atlanta, GA 30309 | Direct:
+1.404.815.2315 | Main: +1.404.815.2400 | Fax: +1.404.685.5315 |
ericstolze@paulhastings.com | www.paulhastings.com

From: Alonzo, Julia D. <jalonzo@proskauer.com>

Sent: Wednesday, April 26, 2023 10:27 AM

To: Stolze, Eric D. <ericstolze@paulhastings.com>; Sosa, Javier F. <Jsosa@proskauer.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; Farmer, Will C. <willfarmer@paulhastings.com>; Despina, Luc A. <lucdespins@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Whitner, William K. <kwhitner@paulhastings.com>; Bongartz, Alex <alexbongartz@paulhastings.com>

Cc: Swanson, Nicole O. <NSwanson@proskauer.com>; Dale, Margaret A. <mdale@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>; apavel@omm.com; mhenitesgutierrez@omm.com; Barak, Ehud <ebarak@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; emckeen@omm.com; Peter Friedman <pfriedman@omm.com>; Maria J. DiConza <mdiconza@omm.com>

Subject: [EXT] RE: PREPA - Committee's First Set of Document Requests

--- External Email ---

You don't often get email from jalonzo@proskauer.com. [Learn why this is important](#)

Eric,

We are in receipt of your email and have reviewed the draft joint status report. You do not have our consent to file. The joint status report does not identify a single topic on which we have supposedly reached an impasse that necessitates going to the court. Before filing, you need to confer with us in order to explain the precise issues for which you seek judicial review.

Furthermore, as you are undoubtedly aware, Judge Dein previously denied the Ad Hoc Group of PREPA Bondholders' request to obtain judicial intervention regarding discovery issues that had not yet crystalized into a discovery dispute as contemplated by the Confirmation Procedures Order. See ECF No. 3352. Our April 24 letter to you included responsive information to numerous requests and, as stated in the letter, we are continuing to investigate many of the remaining open issues. Additionally, we are preparing a separate letter providing additional information and documents responsive to, among others, Request Nos. 9, 10, 23, 24, 26, and 47. In light of our ongoing investigation, and without knowing what specific issues that you believe require judicial review, we cannot consent to the joint status report at this time.

Thank you.

Julia

Julia D. Alonzo

Senior Counsel
(she/her/hers)

[Proskauer](#)

Eleven Times Square
New York, NY 10036-8299
d 212.969.4558
f 212.969.2900
jalonzo@proskauer.com

greenspaces

Please consider the environment before printing this email.

From: Stolze, Eric D. <ericstolze@paulhastings.com>

Sent: Tuesday, April 25, 2023 11:09 PM

To: Sosa, Javier F. <Jsosa@proskauer.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; Farmer, Will C. <willfarmer@paulhastings.com>; Despina, Luc A. <lucdespins@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Whitner, William K. <kwhitner@paulhastings.com>; Bongartz, Alex <alexbongartz@paulhastings.com>

Cc: Swanson, Nicole O. <NSwanson@proskauer.com>; Dale, Margaret A. <mdale@proskauer.com>; Alonzo, Julia D. <jalonzo@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>; apavel@omm.com; mhenitesgutierrez@omm.com; Barak, Ehud <ebarak@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; emckeen@omm.com; Peter Friedman <pfriedman@omm.com>; Maria J. DiConza <mdiconza@omm.com>

Subject: RE: PREPA - Committee's First Set of Document Requests

This email originated from outside the Firm.

Counsel,

A proposed joint filing is attached to inform the Court of this discovery dispute. Please advise if we have your consent to file. Thank you.

**PAUL
HASTINGS**

Eric D. Stolze | Of Counsel, Litigation Department

Paul Hastings LLP | 1170 Peachtree Street, N.E., Suite 100, Atlanta, GA 30309 | Direct:
+1.404.815.2315 | Main: +1.404.815.2400 | Fax: +1.404.685.5315 |
ericstolze@paulhastings.com | www.paulhastings.com

From: Sosa, Javier F. <Jsosa@proskauer.com>

Sent: Monday, April 24, 2023 9:54 PM

To: Stolze, Eric D. <ericstolze@paulhastings.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; Farmer, Will C. <willfarmer@paulhastings.com>; Despina, Luc A. <lucdespins@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Whitner, William K. <kwhitner@paulhastings.com>; Bongartz, Alex <alexbongartz@paulhastings.com>

Cc: Swanson, Nicole O. <NSwanson@proskauer.com>; Dale, Margaret A. <mdale@proskauer.com>; Alonzo, Julia D. <jalonzo@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>; apavel@omm.com; mbenitesgutierrez@omm.com; Barak, Ehud <ebarak@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; emckeen@omm.com; Peter Friedman <pfriedman@omm.com>; Maria J. DiConza <mdiconza@omm.com>

Subject: [EXT] RE: PREPA - Committee's First Set of Document Requests

--- External Email ---

You don't often get email from jsosa@proskauer.com. [Learn why this is important](#)

Counsel – Please see attached.

Javier Sosa

Associate

[Proskauer](#)

Eleven Times Square

New York, NY 10036

d 212.969.3742

f 212.969.2900

Jsosa@proskauer.com

greenspaces

Please consider the environment before printing this email.

From: Stolze, Eric D. <ericstolze@paulhastings.com>

Sent: Friday, April 21, 2023 2:19 PM

To: Sosa, Javier F. <Jsosa@proskauer.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; Farmer, Will C. <willfarmer@paulhastings.com>; Despina, Luc A. <lucdespins@paulhastings.com>; Jimenez, Pedro

<pedrojimenez@paulhastings.com>; Whitner, William K. <kwhitner@paulhastings.com>; Bongartz, Alex
<alexbongartz@paulhastings.com>

Cc: Swanson, Nicole O. <NSwanson@proskauer.com>; Dale, Margaret A. <mdale@proskauer.com>; Alonzo, Julia D.
<jalonzo@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>; apavel@omm.com;
mbenitesgutierrez@omm.com; Barak, Ehud <ebarak@proskauer.com>; Possinger, Paul V.
<ppossinger@proskauer.com>; emckeen@omm.com; Peter Friedman <pfriedman@omm.com>; Maria J. DiConza
<mdiconza@omm.com>

Subject: RE: PREPA - Committee's First Set of Document Requests

This email originated from outside the Firm.

All,

Further to our discussion this week, please find the request-specific list of issues on which you requested additional information below. This list is not intended to be comprehensive of our concerns regarding the Responses & Objections, and all rights are expressly reserved.

In addition, we are having issues accessing the data room. Our logins are not being processed, and the main domain is displaying an Apache server test page. Is this a known issue and, if so, what is the estimated time to resolution?

Apache 2 Test Page

powered by the **Apache httpd server**

This page is used to test the proper operation of the Apache HTTP server after it has been installed. If you can read this page it means that the Apache HTTP server installed at this site is working properly.

If you are a member of the general public:

The fact that you are seeing this page indicates that the website you just visited is either experiencing problems or is undergoing routine maintenance.

If you would like to let the administrators of this website know that you've seen this page instead of the page you expected, you should send them e-mail. In general, mail sent to the name "webmaster" and directed to the website's domain should reach the appropriate person.

For example, if you experienced problems while visiting www.example.com, you should send e-mail to "webmaster@example.com".

If you are the website administrator:

You may now add content to the directory `/var/www/html/`. Note that until you do so, people visiting your website will see this page and not your content. To prevent this page from ever being used, follow the instructions in the file `/etc/httpd/conf.d/welcome.conf`.

You are free to use the images below on Apache Linux powered HTTP servers. Thanks for using Apache!



RFP	Note
36	No Documents available address reasons, revenue foregone, alternatives, or other aspects of our Request. Please advise whether, and when, you intend to make this information available.
41	As the most recent report in the data room is from March 17, 2023, please provide details regarding the rolling schedule for later (and future) time periods.
42, 44	No Documents appear to provide listing of assets, values, or identify whether assets are in use/available. Please advise whether, and when, you intend to make this information available.

45-46	We are willing to cooperate with you on the specific aging periods and customer groups, among other criteria, that are available within the relevant accounting system(s). Please provide us with available parameters and ranges for the applicable systems regarding accounts receivable, and we will respond.
48	The Response to this request directs us to the "Certain Briefing Related to Litigation Settlements" folder in the data Room, but no responsive Documents appear within this folder. Please advise if the correct folder is identified.



Eric D. Stolze | Of Counsel, Litigation Department

Paul Hastings LLP | 1170 Peachtree Street, N.E., Suite 100, Atlanta, GA 30309 | Direct: +1.404.815.2315 | Main: +1.404.815.2400 | Fax: +1.404.685.5315 |
ericstolze@paulhastings.com | www.paulhastings.com

From: Sosa, Javier F. <jsosa@proskauer.com>

Sent: Wednesday, April 19, 2023 6:10 PM

To: Bassett, Nicholas <nicholasbassett@paulhastings.com>; Farmer, Will C. <willfarmer@paulhastings.com>; Despina, Luc A. <lucdespins@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Whitner, William K. <kwhitner@paulhastings.com>; Stolze, Eric D. <ericstolze@paulhastings.com>; Bongartz, Alex <alexbongartz@paulhastings.com>

Cc: Swanson, Nicole O. <NSwanson@proskauer.com>; Dale, Margaret A. <mdale@proskauer.com>; Alonzo, Julia D. <jalonzo@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>; apavel@omm.com; mbenitesgutierrez@omm.com; Barak, Ehud <ebarak@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; emckeen@omm.com; Peter Friedman <pfriedman@omm.com>; Maria J. DiConza <mdiconza@omm.com>

Subject: [EXT] RE: PREPA - Committee's First Set of Document Requests

--- External Email ---

You don't often get email from jsosa@proskauer.com. [Learn why this is important](#)

As discussed during today's meet-and-confer, the password for the protected documents in the "Legacy Charge Model and Related Data" folder in the Plan Depository is: brattlesquare

Please let us know if you have any further difficulties with unlocking those files.

Best,
Javier

Javier Sosa
Associate

[Proskauer](#)

Eleven Times Square
New York, NY 10036
d 212.969.3742
f 212.969.2900
Jsosa@proskauer.com

greenspaces

Please consider the environment before printing this email.

-----Original Appointment-----

From: Alonzo, Julia D. <jalonzo@proskauer.com>

Sent: Tuesday, April 18, 2023 10:54 AM

To: Alonzo, Julia D.; Bassett, Nicholas

Cc: Swanson, Nicole O.; Farmer, Will C.; Despina, Luc A.; Jimenez, Pedro; Bongartz, Alex; Dale, Margaret A.; Stafford, Laura; Sosa, Javier F.; apavel@omm.com; mbenitesgutierrez@omm.com; Barak, Ehud; Possinger, Paul V.; Whitner, William K.; Stolze, Eric D.; emckeen@omm.com; Peter Friedman; Maria J. DiConza

Subject: PREPA - Committee's First Set of Document Requests

When: Wednesday, April 19, 2023 4:00 PM-5:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: <https://proskauer.zoom.us/j/6648134950>



Hi there,

Julia Alonzo is inviting you to a scheduled Zoom meeting.

[Join Zoom Meeting](#)

One tap mobile: US: [+16468769923](tel:+16468769923), [6648134950#](tel:+16469313860) or [+16469313860](tel:+16469313860), [6648134950#](tel:+16469313860)

Meeting URL: <https://proskauer.zoom.us/j/6648134950>

Meeting ID: 664 813 4950

Join by Telephone

For higher quality, dial a number based on your current location.

Dial:

US: +1 646 876 9923 or +1 646 931 3860 or +1 309 205 3325 or +1
312 626 6799 or +1 301 715 8592 or +1 305 224 1968 or +1 346 248
7799 or +1 360 209 5623 or +1 386 347 5053 or +1 408 638 0968 or
+1 507 473 4847 or +1 564 217 2000 or +1 669 444 9171 or +1 669
900 6833 or +1 689 278 1000 or +1 719 359 4580 or +1 253 205 0468

or +1 253 215 8782 or 877 853 5257 (Toll Free) or 888 475 4499 (Toll Free) or 833 548 0276 (Toll Free) or 833 548 0282 (Toll Free)

Meeting ID: 664 813 4950

International numbers

Join from an H.323/SIP room system

H.323: [162.255.37.11](tel:162.255.37.11) (US West)
[162.255.36.11](tel:162.255.36.11) (US East)
[115.114.131.7](tel:115.114.131.7) (India Mumbai)
[115.114.115.7](tel:115.114.115.7) (India Hyderabad)
[213.19.144.110](tel:213.19.144.110) (Amsterdam Netherlands)
[213.244.140.110](tel:213.244.140.110) (Germany)
[103.122.166.55](tel:103.122.166.55) (Australia Sydney)
[103.122.167.55](tel:103.122.167.55) (Australia Melbourne)
[149.137.40.110](tel:149.137.40.110) (Singapore)
[64.211.144.160](tel:64.211.144.160) (Brazil)
[149.137.68.253](tel:149.137.68.253) (Mexico)
[69.174.57.160](tel:69.174.57.160) (Canada Toronto)
[65.39.152.160](tel:65.39.152.160) (Canada Vancouver)
[207.226.132.110](tel:207.226.132.110) (Japan Tokyo)
[149.137.24.110](tel:149.137.24.110) (Japan Osaka)

Meeting ID: 664 813 4950

SIP: 6648134950@zoomcrc.com

From: Bassett, Nicholas <nicholasbassett@paulhastings.com>

Sent: Tuesday, April 18, 2023 10:23 AM

To: Alonzo, Julia D. <jalonzo@proskauer.com>

Cc: Swanson, Nicole O. <NSwanson@proskauer.com>; Farmer, Will C. <willfarmer@paulhastings.com>; Despina, Luc A. <lucdespins@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Bongartz, Alex <alex bongartz@paulhastings.com>; Dale, Margaret A. <mdale@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>; Sosa, Javier F. <Jsosa@proskauer.com>; apavel@omm.com; m benitesgutierrez@omm.com; Barak, Ehud <ebarak@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; Whitner, William K. <kwhitner@paulhastings.com>; Stolze, Eric D. <ericstolze@paulhastings.com>; Ashley Pavel <apavel@omm.com>; emckeen@omm.com; Peter Friedman <pfriedman@omm.com>; Maria J. DiConza <mdiconza@omm.com>

Subject: Re: PREPA - Committee's First Set of Document Requests

This email originated from outside the Firm.

Julia, we can make that work. Will you send a dial-in?

Nick Bassett, Partner
Paul Hastings LLP
2050 M St., N.W.
Washington, DC 20036
202.551.1902<<tel:202.551.1902>>

On Apr 17, 2023, at 12:36 PM, Alonzo, Julia D. <jalonzo@proskauer.com> wrote:

--- External Email ---

Nick —


Thanks for your email. We are unavailable on Tuesday but Proskauer and OMM can meet on Wednesday from 4-5 ET. Please let us know if that works for you.

On Apr 14, 2023, at 5:45 PM, Bassett, Nicholas <nicholasbassett@paulhastings.com> wrote:

This email originated from outside the Firm.

Nicole, are you and OMM available to meet and confer early next week, perhaps on Tuesday?

<<https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.paulhastings.com%2F&data=05%7C01%7Cnicholasbassett%40paulhastings.com%7C394aaa9121084feb5e5708db3f61cf90%7C04ffe8f5879440a685011ab59ab5d0c7%7C1%7C0%7C638173461564153766%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=9qSAo%2FgCSgCqabgO5CBiStWgXiRaZry%2FiLcOgrSJY9M%3D&reserved=0>>

< <https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.paulhastings.com%2F&data=05%7C01%7Cnicholasbassett%40paulhastings.com%7C394aaa9121084feb5e5708db3f61cf90%7C04ffe8f5879440a685011ab59ab5d0c7%7C1%7C0%7C638173461564153766%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=9qSAo%2FgCSgCqabgO5CBiStWgXiRaZry%2FiLcOgrSJY9M%3D&reserved=0>>

Nick Bassett | Partner | Financial Restructuring Group
Paul Hastings LLP | 2050 M Street NW, Washington, DC 20036 | Direct: +1.202.551.1902 | Main: +1.202.551.1700 | Fax: +1.202.551.0402 | nicholasbassett@paulhastings.com<<mailto:nicholasbassett@paulhastings.com>> | www.paulhastings.com<<https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.paulhastings.com%2F&data=05%7C01%7Cnicholasbassett%40paulhastings.com%7C394aaa9121084feb5e5708db3f61cf90%7C04ffe8f5879440a685011ab59ab5d0c7%7C1%7C0%7C638173461564153766%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=Omie8rp46QvORkAZ5KkoZunbhg2F%2B%2BAq2CkFLO%2BWoWo%3D&reserved=0>>

From: Swanson, Nicole O. <NSwanson@proskauer.com>

Sent: Friday, April 7, 2023 6:39 PM

To: Farmer, Will C. <willfarmer@paulhastings.com>; Despins, Luc A. <lucdespins@paulhastings.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Bongartz, Alex <alexbongartz@paulhastings.com>

Cc: Dale, Margaret A. <mdale@proskauer.com>; Alonzo, Julia D. <jalonzo@proskauer.com>; Stafford, Laura <lstafford@proskauer.com>; Sosa, Javier F. <Jsosa@proskauer.com>; apavel@omm.com; mbenitesgutierrez@omm.com; Barak, Ehud <ebarak@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>

Subject: [EXT] RE: PREPA - Committee's First Set of Document Requests

--- External Email ---

You don't often get email from nswanson@proskauer.com<<mailto:nswanson@proskauer.com>>. Learn why this is important<<https://aka.ms/LearnAboutSenderIdentification>>

Counsel,

Please see attached.

Best,
Nicole

Nicole Swanson
Associate
(she/her/hers)

Proskauer<<https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.proskauer.com%2F&data=05%7C01%7Cnicholasbassett%40paulhastings.com%7C394aaa9121084feb5e5708db3f61cf90%7C04ffe8f5879440a685011ab59ab5d0c7%7C1%7C0%7C638173461564309995%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ij1haWwILCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=KSlbDbdd10uQIMpz0ftUE1ttruJWaf5wTRrhI4YURQE%3D&reserved=0>>

Eleven Times Square

New York, NY 10036-8299

d 212.969.3593

f 212.969.2900

NSwanson@proskauer.com<<mailto:NSwanson@proskauer.com>>

greenspaces

Please consider the environment before printing this email.

From: Farmer, Will C. <willfarmer@paulhastings.com<<mailto:willfarmer@paulhastings.com>>>

Sent: Friday, March 24, 2023 7:16 PM

To: Dale, Margaret A. <mdale@proskauer.com<<mailto:mdale@proskauer.com>>>; Possinger, Paul V. <ppossinger@proskauer.com<<mailto:ppossinger@proskauer.com>>>; Barak, Ehud

<ebarak@proskauer.com<<mailto:ebarak@proskauer.com>>>; pfriedman@omm.com<<mailto:pfriedman@omm.com>>; mdiconza@omm.com<<mailto:mdiconza@omm.com>>

Cc: Despins, Luc A. <lucdespins@paulhastings.com<<mailto:lucdespins@paulhastings.com>>>; Bassett, Nicholas <nicholasbassett@paulhastings.com<<mailto:nicholasbassett@paulhastings.com>>>; Jimenez, Pedro

<pedrojimenez@paulhastings.com<mailto:pedrojimenez@paulhastings.com>>; Bongartz, Alex

<alexbongartz@paulhastings.com<mailto:alexbongartz@paulhastings.com>>

Subject: PREPA - Committee's First Set of Document Requests

This email originated from outside the Firm.

Counsel,

Please find attached the First Set of Document Requests of the Official Committee of Unsecured Creditors, propounded to the Oversight Board, PREPA, and AAFAF in connection with the Modified Second Amended Title III Joint Plan of Adjustment of Puerto Rico Electric Power Authority.

Best regards,

Will

<<https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.paulhastings.com%2F&data=05%7C01%7Cnicholasbassett%40paulhastings.com%7C394aaa9121084feb5e5708db3f61cf90%7C04ffe8f5879440a685011ab59ab5d0c7%7C1%7C0%7C638173461564309995%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=Omie8rp46QvORkAZ5KkoZunbhg2F%2B%2BAq2CkFLO%2BWoWo%3D&reserved=0>>

<image001.png><<https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.paulhastings.com%2F&data=05%7C01%7Cnicholasbassett%40paulhastings.com%7C394aaa9121084feb5e5708db3f61cf90%7C04ffe8f5879440a685011ab59ab5d0c7%7C1%7C0%7C638173461564309995%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=Omie8rp46QvORkAZ5KkoZunbhg2F%2B%2BAq2CkFLO%2BWoWo%3D&reserved=0>>

Will Clark Farmer | Associate, Financial Restructuring Group

Paul Hastings LLP | 515 South Flower Street, Twenty-Fifth Floor, Los Angeles, CA 90071 | Direct: +1.213.683.6177 | Main: +1.213.683.6000 | Fax: +1.213.996.3177 | willfarmer@paulhastings.com<mailto:willfarmer@paulhastings.com> | www.paulhastings.com<<https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.paulhastings.com%2F&data=05%7C01%7Cnicholasbassett%40paulhastings.com%7C394aaa9121084feb5e5708db3f61cf90%7C04ffe8f5879440a685011ab59ab5d0c7%7C1%7C0%7C638173461564309995%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=Omie8rp46QvORkAZ5KkoZunbhg2F%2B%2BAq2CkFLO%2BWoWo%3D&reserved=0>>

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments. If you reply to this message, Paul Hastings may collect personal information including your name, business name and other contact details, and IP address. For more information about Paul Hastings' information collection, privacy and security principles please click

HERE<<https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.paulhastings.com%2Fglobal-privacy-statement&data=05%7C01%7Cnicholasbassett%40paulhastings.com%7C394aaa9121084feb5e5708db3f61cf90%7C04ffe8f5879440a685011ab59ab5d0c7%7C1%7C0%7C638173461564309995%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=Omie8rp46QvORkAZ5KkoZunbhg2F%2B%2BAq2CkFLO%2BWoWo%3D&reserved=0>>

[jAwMDAiLCJQIjoIV2luMzliLCJBtIl6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=UXALJbLcN0EimOXvjHFOG3MnOu7D6%2Bjfb9c%2BAsERLuU%3D&reserved=0](mailto:Privacy@paulhastings.com)>. If you have any questions, please contact Privacy@paulhastings.com<<mailto:privacy@paulhastings.com>>.

This message and its attachments are sent from a law firm and may contain information that is confidential and protected by privilege from disclosure.

If you are not the intended recipient, you are prohibited from printing, copying, forwarding or saving them.

Please delete the message and attachments without printing, copying, forwarding or saving them, and notify the sender immediately.

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

If you reply to this message, Paul Hastings may collect personal information including your name, business name and other contact details, and IP address. For more information about Paul Hastings' information collection, privacy and security principles please click

HERE<[https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.paulhastings.com%2Fglobal-privacy-](https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.paulhastings.com%2Fglobal-privacy-statement&data=05%7C01%7Cnicholasbassett%40paulhastings.com%7C394aaa9121084feb5e5708db3f61cf90%7C04ffe8f5879440a685011ab59ab5d0c7%7C1%7C0%7C638173461564309995%7CUnknown%7CTWfpbGZsb3d8eyJWljoIMC4wLjAwMDAiLCJQIjoIV2luMzliLCJBtIl6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=UXALJbLcN0EimOXvjHFOG3MnOu7D6%2Bjfb9c%2BAsERLuU%3D&reserved=0)

[statement&data=05%7C01%7Cnicholasbassett%40paulhastings.com%7C394aaa9121084feb5e5708db3f61cf90%7C04ffe8f5879440a685011ab59ab5d0c7%7C1%7C0%7C638173461564309995%7CUnknown%7CTWfpbGZsb3d8eyJWljoIMC4wLjAwMDAiLCJQIjoIV2luMzliLCJBtIl6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=UXALJbLcN0EimOXvjHFOG3MnOu7D6%2Bjfb9c%2BAsERLuU%3D&reserved=0](https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.paulhastings.com%2Fglobal-privacy-statement&data=05%7C01%7Cnicholasbassett%40paulhastings.com%7C394aaa9121084feb5e5708db3f61cf90%7C04ffe8f5879440a685011ab59ab5d0c7%7C1%7C0%7C638173461564309995%7CUnknown%7CTWfpbGZsb3d8eyJWljoIMC4wLjAwMDAiLCJQIjoIV2luMzliLCJBtIl6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=UXALJbLcN0EimOXvjHFOG3MnOu7D6%2Bjfb9c%2BAsERLuU%3D&reserved=0)>. If you have any questions, please contact Privacy@paulhastings.com<<mailto:privacy@paulhastings.com>>.

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

If you reply to this message, Paul Hastings may collect personal information including your name, business name and other contact details, and IP address. For more information about Paul Hastings' information collection, privacy and security principles please click HERE. If you have any questions, please contact Privacy@paulhastings.com.

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments. If you reply to this message, Paul Hastings may collect personal information including your name, business name and other contact details, and IP address. For more information about Paul Hastings' information collection, privacy and security principles please click [HERE](#). If you have any questions, please contact Privacy@paulhastings.com.

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments. If you reply to this message, Paul Hastings may collect personal information including your name, business name and other contact details, and IP address. For more information about Paul Hastings' information collection, privacy and security principles please click [HERE](#). If you have any questions, please contact Privacy@paulhastings.com.

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments. If you reply to this message, Paul Hastings may collect personal information including your name, business name and other contact details, and IP address. For more information about Paul Hastings' information collection, privacy and security principles please click [HERE](#). If you have any questions, please contact Privacy@paulhastings.com.

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments. If you reply to this message, Paul Hastings may collect personal information including your name, business name and other contact details, and IP address. For more information about Paul Hastings' information collection, privacy and security principles please click [HERE](#). If you have any questions, please contact Privacy@paulhastings.com.

This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments. If you reply to this message, Paul Hastings may collect personal information including your name, business name and other contact details, and IP address. For more information about Paul Hastings' information collection, privacy and security principles please click [HERE](#). If you have any questions, please contact Privacy@paulhastings.com.